

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

My Pillow, Inc., DBA MyPillow,

Case No. 21-cv-01015-PJS-DTS

Plaintiff,

v.

US DOMINION, INC., DOMINION  
VOTING SYSTEMS, INC., and  
DOMINION VOTING SYSTEMS  
CORPORATION,

Defendants.

---

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

---

Defendants US Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation (collectively, "Defendants"), through their respective counsel, file this Consent Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint With Demand For Jury Trial ("Motion"), and hereby state as follows:

1. Plaintiff filed its Complaint With Demand For Jury Trial on April 19, 2021. (Dkt. No. 1, "Complaint.")
2. The current deadline for Defendants US Dominion, Inc. and Dominion Voting Systems, Inc. to answer or otherwise respond to the Complaint is May 12, 2021. (Dkt. Nos. 4, 5.) The current deadline for Defendant Dominion Voting Systems Corporation to answer or otherwise respond to the Complaint is May 19, 2021. (Dkt. No. 6.)
3. Defendants request their deadline to answer or otherwise respond to the Complaint be extended to and including June 21, 2021.

4. Defendants have not sought any prior extensions to answer or otherwise respond to Plaintiff's Complaint. This Motion is not made for purposes of delay.

5. Plaintiff My Pillow, Inc. (d/b/a MyPillow, "Plaintiff") consents to this extension.

6. The parties agree that the Court may enter the Proposed Order submitted with this Motion without further notice or a hearing.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and extend Defendants' deadline to answer or otherwise respond to the Complaint to June 21, 2021.

Dated: May 5, 2021

**FAEGRE DRINKER BIDDLE & REATH  
LLP**

s/John W. Ursu

---

John W. Ursu (#032257)  
Deborah A. Ellingboe (#026216)  
Jeffrey P. Justman (#0390413)  
Erica Abshez Moran (#0400606)  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3901  
Telephone: (612) 766-7000  
Fax: (612) 766-1600  
john.ursu@faegredrinker.com  
debbie.ellingboe@faegredrinker.com  
jeff.justman@faegredrinker.com  
erica.moran@faegredrinker.com

***Attorneys for Defendants US Dominion,  
Inc., Dominion Voting Systems, Inc., and  
Dominion Voting Systems Corporation***

Of Counsel:

Justin A. Nelson  
**SUSMAN GODFREY LLP**  
1000 Louisiana Street, #5100  
Houston, Texas 77002  
(713) 651-9366  
jnelson@susmangodfrey.com

Stephen Shackelford, Jr.  
**SUSMAN GODFREY LLP**  
1301 6th Avenue  
New York, NY 10019  
(212) 336-8330  
sshackelford@susmangodfrey.com

Davida Brook  
**SUSMAN GODFREY LLP**  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
(310) 789-3100  
dbrook@susmangodfrey.com

Of Counsel:

Thomas A. Clare, P.C  
Megan L. Meier  
**CLARE LOCKE LLP**  
10 Prince Street  
Alexandria, VA 22314  
(202) 628-7400  
tom@clarelocke.com  
megan@clarelock.com

*Attorneys for Defendants US Dominion,  
Inc., Dominion Voting Systems, Inc., and  
Dominion Voting Systems Corporation*